

MEMORANDUM

TO: Chairwoman Marquez Peterson
Commissioner Kennedy
Commissioner Olson
Commissioner Tovar
Commissioner O'Connor

FROM: Elijah O. Abinah
Director
Utilities Division



DATE: March 12, 2021

RE: IN THE MATTER OF PROPOSED MODIFICATIONS TO THE RULES
REGARDING TERMINATION OF SERVICE (DOCKET NO. RU-00000A-19-
0132)

As a follow up to our conversations over the past couple of days, the Arizona Corporation Commission ("Commission") Utilities Division Staff ("Staff") determined it was necessary to detail the activities that have occurred surrounding this Docket and the rulemaking process as it relates to this Docket.

Prior to docketing a third revised draft of the termination of service rules applicable to electric and gas utilities on November 23, 2020, Staff reviewed the comments filed in the Docket and comments/presentations provided during the workshops. In the cover memo docketed on November 23, 2020, Staff inadvertently left off a deadline for when comments should be filed. On November 27, 2020, Staff filed a memo specifying comments to the latest draft of the revised rules should be docketed by December 14, 2020.

The following parties filed comments in the Docket regarding the third draft of the revised rules by December 14, 2020: Grand Canyon State Electric Cooperative Association, Inc. ("GCSECA"), Tucson Electric Power ("TEP")/UNS Electric ("UNSE")/UNS Gas, AARP, Arizona Public Service Company ("APS"), and Southwest Gas Corporation ("Southwest Gas"). Additional comments were docketed within the next week by Dixie Escalante Rural Electric Association, Inc. ("Dixie") and Wildfire and Arizona PIRG Education Fund ("PIRG").

eCommission currently does not include a service list or intervenors in a rulemaking docket so Staff relies on comments filed in the Docket when exploring any modifications. Throughout the month of January 2021, Staff reviewed the comments that were filed regarding the third draft of the revised rules making modifications to the draft rules as needed. On January 20, 2021, GCSECA, requested a meeting with Staff (see Attachment A). Staff met with GCSECA (which included any concerns from Dixie) on January 26, 2021. Based on that request, Staff believed it

was appropriate to meet with all parties who filed comments on the third draft of the proposed rules.

- On February 1, 2021, APS, requested a meeting with Staff (see Attachment B). Staff met with APS on February 8, 2021.
- On February 1, 2021, GCSECA requested a follow-up meeting with Staff (see Attachment C). Staff met with GCSECA on February 17, 2021.
- On February 3, 2021, Wildfire and PIRG requested a meeting with Staff (see Attachment D). The request specified including TEP and APS in the conversation. Staff met with Wildfire, PIRG, TEP and APS on February 12, 2021.
- On February 4, 2021, TEP/UNSE requested a meeting with Staff (see Attachment E). Staff met with TEP/UNSE on February 9, 2021.
- On February 17, 2021, Staff reached out to AARP about possibly discussing their comments. AARP responded the same day (see Attachment F). (The comments docketed by AARP did not contain a contact phone number or email to reach Ms. Dana Kennedy. It took a couple of days for Staff to locate a contact number/email.). Staff met with AARP on February 24, 2021.

A joint meeting was held with all parties who filed comments on the electric rules on March 5, 2021. Those in attendance were: GCSECA, TEP/UNSE, AARP, APS, Wildfire and PIRG. In addition, Staff discussed the termination of service rules over the phone with UNS Gas and Southwest Gas separately. Staff sought the inclusion of all parties who filed comments to the third draft of the revised rules to fully understand their concerns prior to any modifications to the revised rules.

It has been a long-standing practice for Staff, and encouraged by the Commission, to meet with regulated or unregulated entities when a party or individual requests a meeting on any pending proceeding at the Commission,

At the same time, during the February 2021 Commission Open Meeting, Staff explained that Staff would not be holding any further workshops regarding the electric and gas termination of service rules and would be docketing a draft of the rules for Commission consideration and vote during the March 2021 Commission Open Meeting to begin the formal rulemaking process. Staff docketed the formal rulemaking documents including proposed revisions to the termination of service rules for electric and gas utilities on March 10, 2021.

EOA:RSP:jn/MAS

Originator: Ranelle S. Paladino

Candrea Allen

From: Cranston, Jennifer A. <jennifer.cranston@gknet.com>
Sent: Wednesday, January 20, 2021 3:03 PM
To: Candrea Allen
Subject: RE: ACC Service Termination Rule revisions (19-0132) -- Cooperative-specific rule proposal

I'll take care of it. Thanks.

Jennifer A. Cranston
602-530-8191 | jennifer.cranston@gknet.com
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From: Candrea Allen [<mailto:CAllen@azcc.gov>]
Sent: Wednesday, January 20, 2021 3:01 PM
To: Cranston, Jennifer A. <jennifer.cranston@gknet.com>
Cc: Maureen Scott <mscott@azcc.gov>; Bridget Humphrey <BHumphrey@azcc.gov>
Subject: RE: ACC Service Termination Rule revisions (19-0132) -- Cooperative-specific rule proposal

It's already been sent, but I can forward it to him.

Candrea Allen

From: Cranston, Jennifer A. <jennifer.cranston@gknet.com>
Sent: Wednesday, January 20, 2021 2:56 PM
To: Candrea Allen <CAllen@azcc.gov>
Cc: Maureen Scott <mscott@azcc.gov>; Bridget Humphrey <BHumphrey@azcc.gov>
Subject: RE: ACC Service Termination Rule revisions (19-0132) -- Cooperative-specific rule proposal

Great. Can you please include Jorge Canaca (JCanaca@gcseca.coop) on the invite?

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From: Candrea Allen [<mailto:CAllen@azcc.gov>]
Sent: Wednesday, January 20, 2021 2:53 PM
To: Cranston, Jennifer A. <jennifer.cranston@gknet.com>

Cc: Maureen Scott <mscott@azcc.gov>; Bridget Humphrey <BHumphrey@azcc.gov>
Subject: RE: ACC Service Termination Rule revisions (19-0132) -- Cooperative-specific rule proposal

Jennifer,

It looks like 1/26 is the date that everyone is available. You will be getting a Teams meeting invite.

Candrea Allen

From: Cranston, Jennifer A. <jennifer.cranston@gknet.com>
Sent: Wednesday, January 20, 2021 1:49 PM
To: Candrea Allen <CAllen@azcc.gov>
Cc: Maureen Scott <mscott@azcc.gov>; Bridget Humphrey <BHumphrey@azcc.gov>
Subject: RE: ACC Service Termination Rule revisions (19-0132) -- Cooperative-specific rule proposal

Candrea:

Here are some dates/times for next week:

Monday, January 25: 11:00 a.m.

Tuesday, January 26: 9:00 to 11:30 a.m.

Wednesday, January 27: 1:00 p.m.

If none of these work, we can look at the week in February, but I thought we might try these first. Thanks!

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From: Candrea Allen [<mailto:CAllen@azcc.gov>]
Sent: Wednesday, January 20, 2021 1:04 PM
To: Cranston, Jennifer A. <jennifer.cranston@gknet.com>
Cc: Maureen Scott <mscott@azcc.gov>; Bridget Humphrey <BHumphrey@azcc.gov>
Subject: RE: ACC Service Termination Rule revisions (19-0132) -- Cooperative-specific rule proposal

Yes.

Candrea Allen

From: Cranston, Jennifer A. <jennifer.cranston@gknet.com>
Sent: Wednesday, January 20, 2021 12:52 PM
To: Candrea Allen <CAllen@azcc.gov>
Cc: Maureen Scott <mscott@azcc.gov>
Subject: RE: ACC Service Termination Rule revisions (19-0132) -- Cooperative-specific rule proposal

Candrea:

Thanks so much for the prompt response. Just so I'm clear, I think the weeks you're asking about are January 25–29 and February 8–12. Is that correct?

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From: Candrea Allen [<mailto:CAllen@azcc.gov>]
Sent: Wednesday, January 20, 2021 12:48 PM
To: Cranston, Jennifer A. <jennifer.cranston@gknet.com>
Cc: Maureen Scott <mscott@azcc.gov>
Subject: RE: ACC Service Termination Rule revisions (19-0132) -- Cooperative-specific rule proposal

Hi Jennifer,

I hope you are well. What is your availability for next week, or the week after OM? I realize that the week after OM may be cutting it a bit close, but that may be best for the Director's Office availability. Thanks.

Candrea Allen

From: Cranston, Jennifer A. <jennifer.cranston@gknet.com>
Sent: Wednesday, January 20, 2021 12:13 PM
To: Candrea Allen <CAllen@azcc.gov>
Cc: Maureen Scott <mscott@azcc.gov>
Subject: ACC Service Termination Rule revisions (19-0132) -- Cooperative-specific rule proposal

Hi Candrea. I hope this email finds you doing well in 2021.

I'm writing to see if we can schedule a time to discuss with Staff the Cooperative-specific provision proposed by GCSECA in the attached, filed in December. I know Staff is very busy, but we are concerned that this rulemaking is moving quickly and we want to be sure we have an opportunity to fully vet this concept with Staff.

Thanks in advance for your review and response.

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Candrea Allen

From: Rodney.Ross@aps.com
Sent: Wednesday, February 3, 2021 2:25 PM
To: Candrea Allen
Subject: RE: Disconnection Rules

Candrea, I just found out that Friday the 12th does NOT work for us, unfortunately. Can you let me know if next Monday, February 8 from 3 – 3:30 still works for you?

-Rod

From: Candrea Allen <CAllen@azcc.gov>
Sent: Wednesday, February 3, 2021 8:52 AM
To: Ross, Rodney <Rodney.Ross@aps.com>
Subject: RE: Disconnection Rules

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Hi Rod,

I'm getting something scheduled. Once it's setup, I'll let you forward to whomever on your end. Does that work?

Candrea Allen

From: Rodney.Ross@aps.com <Rodney.Ross@aps.com>
Sent: Tuesday, February 2, 2021 5:23 PM
To: Candrea Allen <CAllen@azcc.gov>
Subject: RE: Disconnection Rules

How about the 12th? We can do anytime between 9 and 10:30am. (10 – 10:30 is fine if you have something at 10:30)

-Rod

From: Candrea Allen <CAllen@azcc.gov>
Sent: Tuesday, February 2, 2021 10:18 AM
To: Ross, Rodney <Rodney.Ross@aps.com>
Subject: RE: Disconnection Rules

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Hi Rod,

Unfortunately those times don't work. This is what I have for next week:

Friday (2/5) 3:30-4:00 pm
Monday (2/8) 3-4 pm
Tuesday (2/9) 10:30-11:30 am
Friday (2/12) 10-11 am, anywhere from 2-4 pm

Do any of these work for you guys?

Candrea Allen

From: Rodney.Ross@aps.com <Rodney.Ross@aps.com>
Sent: Tuesday, February 2, 2021 9:52 AM
To: Candrea Allen <CAllen@azcc.gov>
Subject: RE: Disconnection Rules

Thanks, Candrea!

We have the following two options available:

This Friday at 9:15 – 10am
Next Monday at 2:30 – 3:30

Let me know if either of these work for you.

Thanks,

-Rod

From: Candrea Allen <CAllen@azcc.gov>
Sent: Monday, February 1, 2021 2:55 PM
To: Ross, Rodney <Rodney.Ross@aps.com>
Subject: Disconnection Rules

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Hi Rod,

I got your voicemail. Sorry I missed your call. Could you give me your team's availability for this Friday (2/5) and next week? I will see what we can schedule. Thanks!

Candrea Allen

*Executive Consultant-Utilities Division
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Candrea Allen

From: Ranelle Paladino
Sent: Tuesday, February 9, 2021 12:52 PM
To: Cranston, Jennifer A.
Cc: Jorge Canaca (JCanaca@gcseca.coop); Barbara Keene; Candrea Allen
Subject: RE: GCSECA Rule Proposal -- additional questions re proposed order language and waiver provision

Jennifer,

Thanks for sending over your comments/ideas. What day/time works for you to meet with Staff regarding any possible modifications?

Ranelle

From: Cranston, Jennifer A. <jennifer.cranston@gknet.com>
Sent: Thursday, February 4, 2021 12:10 PM
To: Candrea Allen <CAllen@azcc.gov>
Cc: Jorge Canaca (JCanaca@gcseca.coop) <JCanaca@gcseca.coop>; Ranelle Paladino <RPaladino@azcc.gov>; Barbara Keene <bkeene@azcc.gov>
Subject: RE: GCSECA Rule Proposal -- additional questions re proposed order language and waiver provision

Candrea:

Again, I'm so appreciative of your response and willingness to work with us. Couple thoughts:

- (1) On the proposed order language modeled on Decision No. 77849, can you include a provision explicitly waiving the requirement in R14-2-212(F) so that it's clear that the Cooperatives do not need to file revised tariffs in response to the revised rules, once effective? Because the prior decision was not a rule change, we did not request this language. But given that we are now in a rulemaking context, specific reference to the rule would provide greater clarity and certainty.
- (2) I agree that a general waiver provision is always a good idea, but we had proposed an expedited process for Cooperatives to change their terms and conditions of service based on approval from their democratically-elected Boards. This process is consistent with another ordering paragraph in Decision No. 77849 and we believe it would be supported by a majority of the Commissioners.

Please let me know if Staff is agreeable to -- would like to schedule a call to discuss -- these requests. Thank you.

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From: Candrea Allen [<mailto:CAllen@azcc.gov>]
Sent: Tuesday, February 02, 2021 10:33 AM
To: Cranston, Jennifer A. <jennifer.cranston@gknet.com>

Cc: Jorge Canaca (JCanaca@gcseca.coop) <JCanaca@gcseca.coop>; Ranelle Paladino <RPaladino@azcc.gov>; Barbara Keene <bkeene@azcc.gov>

Subject: RE: GCSECA Rule Proposal -- follow up from call with Robin

Jennifer,

Since this has only been brought up since our last discussion, we are still working on the exact wording. There are several sections of the Rules that include specific waiver provisions (R14-2-1816, 2419 and 2520). Similar language would be added. Regarding the proposed order, Staff's intent would be to add something similar to the ordering paragraph (starting on page 10) Decision No. 77849 to specifically address the previous Coop decisions. If there is something more you would like us to consider, you can propose something as well for Staff to consider. I hope this helps.

Candrea Allen

From: Cranston, Jennifer A. <jennifer.cranston@gknet.com>

Sent: Tuesday, February 2, 2021 10:08 AM

To: Candrea Allen <CAllen@azcc.gov>

Cc: Jorge Canaca (JCanaca@gcseca.coop) <JCanaca@gcseca.coop>; Ranelle Paladino <RPaladino@azcc.gov>; Barbara Keene <bkeene@azcc.gov>

Subject: RE: GCSECA Rule Proposal -- follow up from call with Robin

Thanks for the prompt response Candrea. Without seeing the language, it's hard to know whether this proposal addresses the Cooperatives' concerns. Can you share so we can determine whether another discussion is necessary?

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From: Candrea Allen [<mailto:CAllen@azcc.gov>]

Sent: Tuesday, February 02, 2021 9:57 AM

To: Cranston, Jennifer A. <jennifer.cranston@gknet.com>

Cc: Jorge Canaca (JCanaca@gcseca.coop) <JCanaca@gcseca.coop>; Ranelle Paladino <RPaladino@azcc.gov>; Barbara Keene <bkeene@azcc.gov>

Subject: RE: GCSECA Rule Proposal -- follow up from call with Robin

Hi Jennifer,

Staff is intending to include a waiver provision in the draft rules. Also, in the proposed order, Staff will include language regarding the previous Cooperative Decisions. Hopefully, this will alleviate some of the concerns you addressed in our previous call. If you would still like to discuss, let me know and I can set something up. Thanks.

Candrea Allen

From: Cranston, Jennifer A. <jennifer.cranston@gknet.com>

Sent: Monday, February 1, 2021 5:00 PM

To: Candrea Allen <CAllen@azcc.gov>
Cc: Jorge Canaca (JCanaca@gcseca.coop) <JCanaca@gcseca.coop>
Subject: RE: GCSECA Rule Proposal -- follow up from call with Robin

Candrea:

I just spoke with Robin and I think we are on the same page. While R14-2-212(I) (which is the provision Eli mentioned during our call) states that Commission-approved variations and exemptions trump generally applicable rules, approval of a variation does not apply to future rule changes because R14-2-212(F) requires all utilities to file updated tariffs within 120 days of the effective date of Commission rules. As a result, the Cooperatives will need some sort of provision in the revised rules to grandfather their prior decisions. It seems like there are a couple of different options for accomplishing this. One is the provision GCSECA suggested in its December filing, which we prefer because it also establishes a streamlined method of future revisions once approved by a Cooperative's Board of Directors.

Please let me know when Staff is available to discuss. Thanks.

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From: Candrea Allen [<mailto:CAllen@azcc.gov>]
Sent: Friday, January 29, 2021 2:30 PM
To: Cranston, Jennifer A. <jennifer.cranston@gknet.com>; Jorge Canaca (JCanaca@gcseca.coop) <JCanaca@gcseca.coop>
Subject: RE: GCSECA Rule Proposal

Well, I just heard from the Director's Office. If there is a need to have another discussion, we can set something up after you've had a chance to talk with Robin. Sorry for any confusion. Thanks!

Candrea Allen

From: Cranston, Jennifer A. <jennifer.cranston@gknet.com>
Sent: Friday, January 29, 2021 12:49 PM
To: Candrea Allen <CAllen@azcc.gov>; Jorge Canaca (JCanaca@gcseca.coop) <JCanaca@gcseca.coop>
Subject: RE: GCSECA Rule Proposal

I emailed Robin but have not heard back. I'll be back in AZ on Monday and should be available for a call, depending on the time.

Sent from my smartphone

----- Original message -----

From: Candrea Allen <CAllen@azcc.gov>

Date: 1/29/21 11:16 AM (GMT-08:00)

To: "Cranston, Jennifer A." <jennifer.cranston@gknet.com>, "Jorge Canaca (JCanaca@gcseca.coop)" <JCanaca@gcseca.coop>

Subject: GCSECA Rule Proposal

Hi Jennifer and Jorge,

I don't know if you've had a chance to talk with robin yet but Eli was wanting to schedule something with you on Monday. Will you be available?

Candrea Allen

Executive Consultant-Utilities Division

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Elijah Abinah

From: Elijah Abinah
Sent: Wednesday, February 3, 2021 4:43 PM
To: Jackie Neese
Cc: Ranelle Paladino; Briton Baxter; Candrea Allen
Subject: FW: Disconnection Rules

Jackie can you pls coordinate and invite everyone on this e mail. Thanks

From: Cynthia Zwick <czwick@wildfireaz.org>
Sent: Wednesday, February 3, 2021 11:26 AM
To: Elijah Abinah <EAbinah@azcc.gov>
Cc: Diane Brown PIRG <dbrown@arizonapirg.org>
Subject: Disconnection Rules

Eli, I hope this finds you well. I know you're incredibly busy.

I am writing to ask if you would have a few minutes to sit down with me and Diane Brown, along with one or two folks from both TEP and APS to talk about the draft disconnection rules.

We truly appreciate all the work that you and your team have done and we would appreciate an opportunity to connect and talk a bit about the current draft and the draft you continue to refine. We think there is some information that both the utilities have and we have that could be of interest as you begin to finalize the proposal.

Please let me know if there are a couple of dates and times in the next week or so that work for you and I'll set the conversation up.

Thank you so much. I look forward to talking with you.
Cynthia

Cynthia Zwick
Executive Director

wildfire



340 E Palm Lane, Ste 315, Phoenix, AZ 85004 [map](#)
[602.604.0640](tel:602.604.0640) ext 103 [602.604.0644](tel:602.604.0644) wildfireAZ.org

Ranelle Paladino

From: Ranelle Paladino
Sent: Thursday, February 4, 2021 4:17 PM
To: KKansfield@tep.com
Subject: RE: As discussed

Either Tuesday or Thursday. I can have Jackie send a meeting invite if one day is better than another for you.

Ranelle

From: KKansfield@tep.com <KKansfield@tep.com>
Sent: Thursday, February 4, 2021 12:14 PM
To: Ranelle Paladino <RPaladino@azcc.gov>
Subject: As discussed
Importance: High

Hi Ranelle, here are some options for meeting about disconnection rules. However, if these don't work we can happily accommodate your schedule for whatever works for you.

Tues Feb 9, 11-12pm
Weds Feb 10, 3-4pm
Thurs Feb 11, 3-4pm

Thank you.

Karen Kansfield : Manager, Regulatory Services : Tucson Electric Power/UniSource Energy Services
kkansfield@tep.com : M: (520) 237-2572

Ranelle Paladino

From: Kennedy, Dana M. <dkennedy@aarp.org>
Sent: Wednesday, February 17, 2021 3:13 PM
To: Ranelle Paladino
Subject: RE: Disconnect Rules

Hi Ranelle,

Yes would welcome a virtual meeting with a couple of people from my team. Thanks for reaching out and look forward to setting up time to discuss.

Dana Marie Kennedy
State Director, AARP Arizona
dkennedy@aarp.org
Phone (602) 262-5191
7250 N. 16th Street, Suite 302
Phoenix, AZ 85020

We have a lot going on at AARP Arizona <http://states.aarp.org/region/arizona/>

Sign up for an event in Phoenix! www.aarp.org/phoenix

Sign up for our Advocacy alerts here

FB: <https://www.facebook.com/aarparizona>

Twitter: <https://twitter.com/AARPArizona>



From: Ranelle Paladino <RPaladino@azcc.gov>
Sent: Wednesday, February 17, 2021 2:57 PM
To: Kennedy, Dana M. <dkennedy@aarp.org>
Subject: Disconnect Rules

Ms. Kennedy,

The ACC is in the process of making revisions to the draft termination of service rules for the electric and gas utilities in the state. I read through the comments that you docketed in 19-0132 on behalf of AARP. Staff is trying to meet with (over the phone) everyone who docketed comments to make sure we understand the concerns. Would you be interested in a conference call with Staff to talk through your comments to the draft rules? Thanks.

Ranelle Paladino
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Phoenix, AZ 85007
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